

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KENNITH PAUL HOWELL,

Plaintiff,

v.

HARRIS COUNTY, TEXAS et al,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:24-cv-00468

JURY DEMAND

DEFENDANTS' NOTICE OF WRITTEN DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Harris County file this, its Certificate of Written Discovery, and states it has served Defendant's Expert Designations and Chief Michael Dirden's Report (10-22-2024) pursuant to Rule 26 (a) .

Date: October 23, 2024

Respectfully submitted,

CHRISTIAN D. MENELEE

HARRIS COUNTY ATTORNEY

JONATHAN G. C. FOMBONNE

DEPUTY COUNTY ATTORNEY AND FIRST
ASSISTANT

NATALIE G. DELUCA

MANAGING COUNSEL,
DEFENSIVE LITIGATION, EMPLOYMENT, & REAL
ESTATE DIVISIONS

By: /s/ James C. Butt

JAMES C. BUTT

Assistant County Attorney
ATTORNEY-IN-CHARGE

State Bar No. 24040354
Fed. Bar No. 725423
Tel: (713) 274-5133 (direct)
james.butt@harriscountytexas.gov
FRANK J. FORD
Assistant County Attorney
ATTORNEY-TO BE NOTICED
State Bar No. 24012642
Fed. Bar No. 565385
Tel: (713) 274-5166 (direct)
frank.ford@harriscountytexas.gov

OFFICE OF THE HARRIS COUNTY ATTORNEY
1019 Congress
Houston, Texas 77002
Tel: (713) 274-5133 (direct)

**ATTORNEYS FOR DEFENDANT
HARRIS COUNTY**

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon Plaintiff as indicated:

Joshua R. Willoughby
The Willoughby Law Firm, LLC
4200 Montrose Blvd., Suite 540
Houston, Texas 77006
ATTORNEYJRW@GMAIL.COM

/s/ James C. Butt
James C. Butt